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Attorneys for Defendant SoFi Bank, N.A.

# UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Angela Bangert,	CASE NO. 2:22-cv-01418-RFB-BNW	
Plaintiff,		
v.	STIPULATION AND ORDER TO AMEND DISCOVERY PLAN AND SCHEDULING ORDER	
SoFi Bank N.A., et al.,		
Defendants.	(First Request)	

Defendant SoFi Bank, N.A. ("SoFi") and Plaintiff Angela Bangert (jointly, the "Parties"), by and through their respective counsel, hereby stipulate and agree to amend the Discovery Plan and Scheduling Order (ECF No. 37) by extending the outstanding discovery deadlines for a period of ninety (90) days. This is the first request for an extension to the Discovery Plan and Scheduling Order in this matter, and it is sought in good faith and not for purposes of delay.

#### I. Discovery Completed and Remaining

Plaintiff has served written discovery to SoFi. SoFi has served written discovery to Plaintiff and a notice of deposition of Plaintiff. Neither Party has responded to the written discovery, and SoFi has not yet deposed Plaintiff.

## II. Good Cause Exists for the Requested Extension

<sup>&</sup>lt;sup>1</sup> Plaintiff has resolved her claims against Defendants Experian Information Solutions, Inc. and Equifax Information Services, LLC.

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Good cause exists for the requested extension. The Parties are conducting settlement discussions and hope to settle this case within the next ninety (90) days.

### **Proposed Discovery Deadlines** III.

The Parties request an order extending the deadlines as set forth below.

Event	Current Deadline	New Deadline
Discovery Cutoff	January 7, 2024	April 8, 2024
Expert Disclosures (Initial)	November 10, 2023	February 8, 2024
Expert Disclosures (Rebuttal)	December 8, 2023	March 7, 2024
Dispositive Motions	February 23, 2024	May 23, 2024
Pretrial Order	May 7, 2024	August 5, 2024

IT IS SO STIPULATED.

DATED this 11th day of October, 2023.

BALLARD SPAHR LLP	LOKER LAW, APC

By: /s/ Madeleine Coles	By: /s/ Matthew M. Loker
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# **ORDER**

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: <u>10/13/2023</u>